



THE CITY OF NEW YORK  
**LAW DEPARTMENT**  
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**By Regular Mail**

Vincent Eke-Nweke, Esq.  
Law Offices of Vincent Eke-Nweke, Esq.  
498 Atlantic Avenue  
Brooklyn, New York 11217

Re: Merlene Bacchus v. The City of New York, et al.  
12 Civ. 1663 (PKC)(MDG)

Dear Mr. Eke-Nweke:

I am a Senior Counsel in the office of Zachary W. Carter, Corporation Counsel of the City of New York, attorney for defendants the New York City Department of Education and Renée Pepper ("City Defendants") in the above-referenced action. Enclosed please find the following documents:

- City Defendants' Notice of Motion for Summary Judgment;
- City Defendant's Local Rule 56.1 Statement of Undisputed Facts;
- Declaration of Kathryn E. Martin, with accompanying exhibits, in Support of City Defendants' Motion for Summary Judgment; and
- Memorandum of Law in Support of City Defendants' Motion for Summary Judgment.

Very truly yours,

Kathryn E. Martin  
Senior Counsel

Encl.

cc: Jesse Gribben, Esq.  
Ximena Naranjo, Esq.  
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